



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MPR/RCH/EMR
F. #2019R00927

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 6, 2020

By FedEx

Cesar DeCastro, Esq.
7 World Trade Center, 34th Floor
New York, NY 10007

Re: United States v. Genaro Garcia Luna
Criminal Docket No. 19-576 (BMC)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Please note the enclosed discovery contains Protected Material and should be handled consistently with the Protective Order. The government also requests reciprocal discovery from the defendant.

By separate letter sent to you today, the government also is providing notice of certain potential government witnesses' photo identifications related to the defendant. The government will provide additional such information as it becomes available. This letter is subject to the Court's Protective Order.

I. The Government's Discovery

Enclosed please find:

- Information downloaded from the defendant's electronic devices, previously provided to you on February 20, 2020 and Bates-numbered 0000032705, now Bates-numbered 000189365 to 000950521;
- Ledgers and Business and Financial Records, Bates-numbered 0000950522-0000951081, 0000953541-0000953740 and 0000954200-0000955694;
- Property Records, Bates-numbered 0000951082-0000951085;
- Mutual Legal Assistance Treaty requests and responses, Bates-numbered 0000951086-0000953020;
- Intentionally Left Blank, Bates-numbered 0000953021-0000953040 and 0000953533-0000953540;
- Recorded communications, Bates-numbered 0000953041-0000953532;
- Photos, Bates-numbered 0000953741-0000954194

- Files from Mexican law enforcement, Bates-numbered 0000954195-0000954198;
- Video evidence, Bates-numbered 0000954199-0000954199;
- Public records, Bates-numbered 0000955695-0000955721.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
Michael P. Robotti
Ryan C. Harris
Erin M. Reid
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of Court (BMC) (via ECF)